

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

v. **MOTION FOR DEFAULT JUDGMENT AND**  
**ENTRY OF CHARGING ORDER AGAINST**  
**JUDGMENT DEBTOR'S INTEREST IN ABBE MANAGEMENT GROUP, LLC**

SURINDER MULTANI, et al.

DEFENDANTS

\*\* \*\* \*

Comes now the Plaintiff, GD Deal Holdings, LLC ("GD Deal Holdings"), by and through counsel, and, pursuant to FED. R. CIV. P. 54, FED. R. CIV. P. 69, and 805 ILCS 180/30-20, for its Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in ABBE Management Group, LLC ("ABBE Management"), states as follows:

1. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate of 4.9% per annum from the date of judgment until paid.

2. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

3. GD Deal Holdings is informed, and on the basis of such information and belief alleges, that Surinder Multani is a member of ABBE Management. A copy of the Application of ABBE Management for a certificate to transact business in Michigan that was filed by Surinder Multani is attached hereto as "Exhibit A". A copy of a printout from the Illinois Secretary of State's website demonstrating that the principal office for ABBE Management is the same principal business office address for Surinder Multani is attached hereto as "Exhibit B".

4. ABBE Management was served with process on March 31, 2008, and has failed to file responsive pleadings herein within twenty (20) days thereafter, said Defendant being in default. A copy of the certified mail receipt for the Summons served on the registered agent for ABBE Management is attached hereto as "Exhibit C".

5. GD Deal Holdings is entitled, under FED. R. CIV. P. 69 and 805 ILCS 180/30-20, to a charging order against the interest of Surinder Multani in ABBE Management.

6. The instant Motion is based on the Affidavit of counsel for GD Deal Holdings, attached hereto as "Exhibit D", and all the pleadings, records and papers on file in this action.

WHEREFORE, the Plaintiff, GD Deal Holdings, LLC, requests:

1. An Order requiring ABBE Management to produce a copy of all agreements concerning Surinder Multani's interest and the interest of other members in ABBE Management, together with evidence showing the interest of Surinder Multani in the income of ABBE Management;

2. A charging order against Surinder Multani's interest in ABBE Management or any other entity or joint venture in which Surinder Multani has an interest; and

3. Such further relief, at law or in equity, that the Court deems just and proper.

THOMAS M. FALKENBERG  
WILLIAMS MONTGOMERY & JOHN LTD.  
20 North Wacker Drive, Suite 2100  
Chicago, Illinois 60606-3094

-and-

HARNED, BACHERT & DENTON, LLP  
324 East Tenth Avenue  
Post Office Box 1270  
Bowling Green, Kentucky 42102-1270

/s/ Scott A. Bachert  
SCOTT A. BACHERT

CERTIFICATION:

This is to certify that a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court this day, July 23, 2008, by using the CM/ECF system, which will send a notice of electronic filing to the following:

Hon. Lucia Nale  
Hon. Diane Renae Sabol  
Hon. Nicole J. Highland  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, Illinois 630606-4637

Hon. Robert T. Kuehl  
WELTMAN, WEINBERG & REIS CO., L.P.A.  
180 N. LaSalle Street, Suite 2400  
Chicago, Illinois 60601

This is to certify that a true and correct copy of the foregoing document was this day, July 23, 2008, placed in the US Mail, postage prepaid, addressed to the following:

Hon. Leroy Simms  
6061 Savoy Drive  
Houston, Texas 77036

Sapphire Supply, LLC  
c/o: Surinder Multani, Registered Agent  
2015 S. Arlington Hts. Rd. #120  
Arlington Heights, Illinois 60005

Hon. James O. Stola  
3701 West Fullerton Avenue  
Chicago, Illinois 60647

JGG Investments, LLC  
c/o: Kishor Shah, Registered Agent  
5 Whippoorwill Court  
Roselle, Illinois 60172

Surinder Multani  
302 Midwest Club  
Oak Brook, Illinois 60523

ABBE Capital and Leasing, LLC  
c/o: Surinder Multani, Registered Agent  
2015 S. Arlington Hts. Rd. #120  
Arlington Heights, Illinois 60005

Safanpreet Multani  
302 Midwest Club  
Oak Brook, Illinois 60523

ABBE Management Group, LLC  
c/o: Robert S. Luce, Registered Agent  
399 Quentin Rd. Ste. A  
Palatine, Illinois 60067

Surinder Multani  
24 Bright Ridge Drive  
Schaumburg, Illinois 60194

Babaji PS, LLC  
c/o: Narendra Bhalla, Registered Agent  
1718 Fry Road, Suite 415  
Houston, Texas 77084

Safanpreet Multani  
24 Bright Ridge Drive  
Schaumburg, Illinois 60194

ABBE Properties, LLC  
c/o: Surinder Multani, Registered Agent  
2015 S. Arlington Hts. Rd. #120  
Arlington Heights, Illinois 60005

Capital Access & Investments, LLC  
c/o: Narendra Bhalla, Registered Agent  
1718 Fry Road, Suite 415  
Houston, Texas 77084

G & S Portage, Inc.  
c/o: Ajai Agnihotri, Registered Agent  
1856 Samuelson Road  
Portage, Indiana 46368

/s/ Scott A. Bachert  
SCOTT A. BACHERT

# ***Michigan Department of Consumer and Industry Services***

## ***Filing Endorsement***

***This is to Certify that the APPLICATION FOR CERTIFICATE OF AUTHORITY***

***for***

***ABBE MANAGEMENT GROUP, LLC***

***ID NUMBER: B9078G***

***received by facsimile transmission on September 22, 2003 is hereby endorsed filed on September 23, 2003 by the Administrator. The document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.***



Sent by Facsimile Transmissinn 03286

***In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 23rd day of September, 2003.***

A handwritten signature in black ink, appearing to read "Andrew L. Metcalfe".

***, Director***

***Bureau of Commercial Services***

007349

EXHIBIT A

BCS/C9-760 (Rev 08/01)

MICHIGAN DEPARTMENT OF CONSUMER & INDUSTRY SERVICES BUREAU OF COMMERCIAL SERVICES	
Date Received:	(FOR BUREAU USE ONLY)
This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.	
Name	ABBE Management Group, LLC
Address	2015 S Arlington Heights Rd, Suite 120
City	Arlington Heights
State	IL
Zip Code	60005
EFFECTIVE DATE:	

Document will be returned to the name and address you enter above.  
If left blank document will be mailed to the registered office.

B

### APPLICATION FOR CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS IN MICHIGAN

For use by Foreign Limited Liability Companies  
(Please read information and instructions on last page)

Pursuant to the provisions of Act 23, Public Acts of 1993, the undersigned limited liability company executes the following Application:

- The name of the limited liability company is:  
ABBE Management Group, LLC
- (Complete this item only if the limited liability company name in item 1 is not available for use in Michigan.)  
The assumed name of the limited liability company to be used in all its dealings with the Bureau and in the transaction of its business in Michigan is:  
\_\_\_\_\_
- It is organized under the laws of Illinois  
The date of its organization is May 15, 2003  
The duration of the limited liability company if other than perpetual is (Perpetual)
- The address of the office required to be maintained in the state of organization or, if not so required, the principal office of the limited liability company is:  
2015 S. Arlington Heights, Suite 120 Arlington Heights IL 60005  
(Street Address) (City) (State) (ZIP Code)

09/22/2003 05:45PM

007350

5. a. The address of its registered office in Michigan is:

2201 East Grand River, Suite 201, Lansing, Michigan 48912  
(Street Address) (City) (ZIP Code)

- b. The mailing address of the registered office if different than above:

\_\_\_\_\_, Michigan \_\_\_\_\_  
(Street Address or P.O. Box) (City) (ZIP Code)

- c. The name of the resident agent at the registered office is:

National Registered Agents, Inc.

6. The Department is appointed the agent of the foreign limited liability company for service of process if no agent has been appointed, or if appointed, the agent's authority has been revoked, the agent has resigned, or the agent cannot be found or served through the exercise of reasonable diligence.

The name and address of a member or manager or other person to whom the administrator is to send copies of any process served on the administrator is: (Must be different than agent shown in Item 5c)

Surinder Multani, ABBE Management Group, LLC  
(Name)

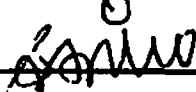
2015 S. Arlington Heights Rd, Suite 120 Arlington Heights IL, 60005  
(Street Address) (City) (State) (ZIP Code)

7. The specific business which the limited liability company is to transact in Michigan is as follows:

ATM Services (leasing and processing of machines) to merchants  
conducting business such as Gas Stations, Truck Stops, C-Stores,  
Restaurants.

The limited liability company is authorized to transact such business in the jurisdiction of its organization.

Signed this 22<sup>nd</sup> day of September, 2003

By   
(Signature)

Surinder Multani Member  
(Type or Print Name) (Type or Print Title)

File Number

0091982-9



*To all to whom these Presents Shall Come, Greeting:*

*I, Jesse White, Secretary of State of the State of Illinois, do hereby certify that*

ABBE MANAGEMENT GROUP, LLC,  
HAVING ORGANIZED IN THE STATE OF ILLINOIS ON MAY 15, 2003,  
APPEARS TO HAVE COMPLIED WITH ALL PROVISIONS OF THE LIMITED  
LIABILITY COMPANY ACT OF THIS STATE RELATING TO THE FILING  
OF THE ARTICLES AND PAYMENT, AND IS ORGANIZED TO TRANSACT  
BUSINESS IN THE STATE OF ILLINOIS.

*In Testimony Whereof, I hereto set  
my hand and cause to be affixed the Great Seal of  
the State of Illinois, this* 17TH  
day of SEPTEMBER 2003  
A.D.

*Jesse White*

SECRETARY OF STATE





**CYBERDRIVEILLINOIS**JESSE WHITE  
SECRETARY OF STATE[SERVICES](#)[PROGRAMS](#)[PRESS](#)[PUBLICATIONS](#)[DEPARTMENTS](#)[CONTACT](#)**LLC FILE DETAIL REPORT**

Entity Name	ABBE MANAGEMENT GROUP, LLC	File Number	00919829
Status	GOODSTANDING	On	05/09/2008
Entity Type	LLC	Type of LLC	Domestic
File Date	05/15/2003	Jurisdiction	IL
Agent Name	ROBERT S LUCE	Agent Change Date	10/25/2007
Agent Street Address	399 QUENTIN RD STE A	Principal Office	2015 S ARLINGTON HTS RD #120 ARLINGTON HEIGHTS 60005
Agent City	PALATINE	Management Type	MGR
Agent Zip	60067	Dissolution Date	PERPETUAL
Annual Report Filing Date	05/09/2008	For Year	2008
Assumed Name	ACTIVE - ABBE MERCHANT GROUP		
Series Name	NOT AUTHORIZED TO ESTABLISH SERIES		

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<b>2. Article Number</b>  <b>7160 3901 9845 2711 1542</b>		<b>COMPLETE THIS SECTION ON DELIVERY</b>	
<b>3. Service Type</b> CERTIFIED MAIL		<b>A. Received by (Please Print Clearly)</b>	<b>B. Date of Delivery</b> 3/31/08
<b>4. Restricted Delivery? (Extra Fee)</b> <input type="checkbox"/> Yes		<b>C. Signature</b> 	
<b>1. Article Addressed to:</b> Abbe Management Group, LLC c/o Robert S. Luce, Registered Agent 399 Quentin Road, Suite A Palatine, IL 60067		<b>D. Is delivery address different from item 1?</b> If YES, enter delivery address below:	
27752.00BUBV		TFF	
PS Form 3811, January 2005		Domestic Return Receipt	

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CASE NUMBER 08-CV-1722**

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

**AFFIDAVIT OF SCOTT A. BACHERT**

Scott A. Bachert, being sworn, deposes and says:

1. He is attorney for GD Deal Holdings, LLC, Plaintiff and judgment creditor in the above-entitled action, and makes this Affidavit in support of Plaintiff's foregoing Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in ABBE Management Group, LLC.

2. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate of 4.9% per annum from the date of judgment until paid.

3. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

4. The judgment remains outstanding and unsatisfied.

5. Affiant is informed and believes, and on that basis alleges, that Surinder Multani is a member of ABBE Management Group, LLC and the interest of Surinder Multani may properly be charged with the unpaid judgment in this action.

6. ABBE Management Group, LLC was served with process on March 31, 2008.

7. ABBE Management Group, LLC has failed to file responsive pleadings herein.

8. Affiant has received no pleadings or papers from ABBE Management Group, LLC.

This the 23rd day of July, 2008.

  
SCOTT A. BACHERT

COMMONWEALTH OF KENTUCKY )

COUNTY OF WARREN )

Subscribed, sworn to and acknowledged before me by Scott A. Bachert, on this the 23rd  
day of July, 2008.

  
Shelia Stephens  
NOTARY PUBLIC  
My Commission Expires: 8/25/09

Handwritten signature and initials, possibly "J. P. [unclear]" and "SS".



Faint, mostly illegible text, possibly a date or reference number.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

vs. **DEFAULT JUDGMENT AS AGAINST ABBE MANAGEMENT GROUP, LLC**  
**AND ORDER ENTERING CHARGING ORDER**

SURINDER MULTANI, et al.

DEFENDANTS

\*\* \*\* \*

This matter having come before the Court on GD Deal Holdings, LLC's Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in ABBE Management Group, LLC, the Court finds as follows:

1. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate.

2. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

3. The judgment has not been satisfied.

4. GD Deal Holdings, LLC is entitled as a matter of right under 805 ILCS 180/30-20 to a charging order against any interest of Surinder Multani in a limited liability company. There is no just reason for delay in entry of a charging order.

5. Surinder Multani is a member of ABBE Management Group, LLC.

6. ABBE Management Group, LLC was served with process and a copy of the Complaint on March 31, 2008 and has failed to file responsive pleadings; therefore, being in default.

THEREFORE, IT IS ORDERED that the Plaintiff's Motion for Default Judgment is GRANTED.

IT IS FURTHER ORDERED by the Court that the interest of Surinder Multani as a member of ABBE Management Group, LLC be and is hereby subjected to an encumbrance and charging order in favor of and for the benefit of GD Deal Holdings, LLC.

IT IS FURTHER ORDERED by the Court that ABBE Management Group, LLC pay over to GD Deal Holdings, LLC such amounts as may from time to time become payable or distributable to Surinder Multani by reason of his interest in ABBE Management Group, LLC.

IT IS FURTHER ORDERED by the Court that Surinder Multani pay to GD Deal Holdings, LLC such amounts as may from time to time become payable or distributable to Surinder Multani by reason of his interest in ABBE Management Group, LLC.

IT IS FURTHER ORDERED by the Court that ABBE Management Group, LLC produce, within fifteen (15) days of the date of this Order, a copy of all operating agreements for ABBE Management Group, LLC and/or any other agreement controlling the interest of Surinder Multani, with such documents to be provided to GD Deal Holdings, LLC's attorney, together with evidence showing the value of the capital and/or income attributable to the interest of Surinder Multani in ABBE Management Group, LLC and copies of any and all tax returns filed during the last three (3) years on behalf of ABBE Management Group, LLC.

IT IS FURTHER ORDERED by the Court that ABBE Management Group, LLC file with the Clerk of this Court, within fifteen (15) days of the date of this Order, a sworn statement reporting to the Court all amounts distributable or payable to Surinder Multani at the time of this Order. In such sworn statement, ABBE Management Group, LLC shall state the value at the time of entry of this Order of both the capital and income account attributable to Surinder Multani's interest in ABBE Management Group, LLC.



Jurisdiction is retained for such further orders and proceedings as may be necessary.

DATED, this the \_\_\_\_\_ day of \_\_\_\_\_, 2008.

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JUDGE, UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

Tendered by:

THOMAS M. FALKENBERG  
WILLIAMS MONTGOMERY & JOHN LTD.  
20 North Wacker Drive, Suite 2100  
Chicago, Illinois 60606-3094  
Telephone: (312) 443-3200

-and-

HARNED, BACHERT & DENTON, LLP  
324 East Tenth Avenue  
Post Office Box 1270  
Bowling Green, Kentucky 42102-1270  
Telephone: (270) 782-3938

/s/ Scott A. Bachert  
SCOTT A. BACHERT